U.S. Department of Justice

Tax Division

Civil Trial Section, Eastern Region

DAH:DSM:CJWilliamson
DJ 5-62-13178
CMN 2016101027

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April 11, 2022

Via Email

The Honorable R. Barclay Surrick
United States District Court
    for the Eastern District of Pennsylvania
James A. Byrne U.S. Courthouse
601 Market Street, Room 8614
Philadelphia, PA 19106
Chambers_of_Judge_R_Barclay_Surrick@paed.uscourts.gov

> Re: *Nineveh Investments Ltd. v. United States*
>   <u>16-cv-01068-JD (E.D. Pa.)</u>

Dear Judge Surrick:

Pursuant to the Court's order dated June 22, 2021, the parties submit this update regarding the status of their settlement of this case. (Doc. 99.)

As previously reported, the parties agreed to a settlement, which will resolve this case. The United States reports that Internal Revenue Service is finalizing the necessary administrative steps to effectuate the settlement, including wiring certain settlement funds to Plaintiff Nineveh Investments Limited ("Nineveh"). Once those steps are completed, the parties will submit a stipulation of dismissal.

For its part, Nineveh reports that it has waited more than two months since the settlement was fully agreed to and documented and sees no reason why the settlement funds (which have been agreed to down to the penny) cannot be wired to it immediately. Rather than continuing to wait with no date-certain for payment, Nineveh respectfully requests that the United States be required to wire the settlement funds by April 28, 2022, or that a status conference be scheduled to address the reasons why this deadline cannot be met.

The United States opposes Nineveh's requested deadline. If the Court requests, the United States will provide further information regarding the necessary steps to effectuate the wire transfer in this instance.

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Respectfully submitted,

/s/ Christopher J. Williamson
CHRISTOPHER J. WILLIAMSON
Trial Attorney,
Civil Trial Section, Eastern Region

cc: All counsel of record (via email)